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 and Seth Ravin*

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 ORACLE USA, INC.; a Colorado  
4 corporation; ORACLE AMERICA, INC.; a  
5 Delaware corporation; and ORACLE  
INTERNATIONAL CORPORATION, a  
California corporation,

6 Plaintiffs,

7 v.

8 RIMINI STREET, INC., a Nevada  
9 corporation; and SETH RAVIN, an  
individual,

10 Defendants.

CASE NO. 2:10-cv-0106-LRH-VCF

**JOINT STIPULATION TO MODIFY  
SCHEDULE FOR CERTAIN POST-  
INJUNCTION PROCEEDINGS**

11  
12 Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp.  
13 (together, “Oracle”) and Defendant Rimini Street, Inc. and Seth Ravin (together, “Rimini”;  
14 collectively, “Parties”) jointly submit this Stipulation and [Proposed] Order.

15 WHEREAS, on November 22, 2019, the Court entered a minute order setting certain  
16 deadlines in this case, ECF No. 1289;

17 WHEREAS, due to the COVID-19 pandemic, the Parties stipulated to, and the Court  
18 ordered, an amended schedule extending existing deadlines by six weeks and setting the  
19 deadline for the close of expert discovery to May 8, 2020, the deadline for an OSC motion to  
20 May 27, 2020, the deadline for an OSC opposition to June 17, 2020, and the deadline for an  
OSC reply to July 1, 2020, ECF No. 1322;

21 WHEREAS the Parties further stipulated to “monitor the COVID-19 situation and to  
22 promptly advise the Court regarding the need for any further adjustments to the schedule,” *id.*;

23 WHEREAS subsequent to the Parties’ stipulation, the Governors of both California and  
24 Nevada extended shelter-in-place orders through April (in the case of Nevada) or until further  
25 notice (in the case of California), *see* Declaration of Emergency Directive 010 Stay at Home  
26 Order, Gov. Steve Sisolak (Mar. 31, 2020) (available at [http://gov.nv.gov/News/](http://gov.nv.gov/News/Emergency_Orders/2020/2020-03-31_-_COVID-19_Declaration_of_Emergency_Directive)  
27 [Emergency\\_Orders/2020/2020-03-31\\_-\\_COVID-19\\_Declaration\\_of\\_Emergency\\_Directive](http://gov.nv.gov/News/Emergency_Orders/2020/2020-03-31_-_COVID-19_Declaration_of_Emergency_Directive)  
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\_010\_-\_Stay\_at\_Home\_Order/) Executive Order N-33-20, Gov. Gavin Newsom (Mar. 19, 2020) (available at <https://covid19.ca.gov/img/Executive-Order-N-33-20.pdf>);

WHEREAS similar shelter-in-place orders are in effect in states where the Parties' experts reside, including North Carolina, Illinois, and Oregon;

WHEREAS the COVID-19 pandemic and related orders create significant concerns that in-person expert depositions in this matter can be held legally, safely, and efficiently in May 2020;

WHEREAS, the Parties agree that a further extension of the schedule is appropriate but disagree about how to address certain issues should social distancing continue substantially into the summer months;

WHEREAS, the Parties agree to further meet-and-confer concerning such issues, such as whether and how to implement alternatives to in-person expert depositions, in light of developments over the next several weeks;

WHEREAS the Parties continue to agree to monitor the COVID-19 situation, and to promptly advise the Court regarding the need for any further adjustments to the schedule or procedures in this case; and

THEREFORE, the Parties stipulate, and request that the Court order, that the deadlines in this case be reset as follows:

Event	Current Deadline	Proposed new deadline
Close of expert discovery	May 8, 2020	June 5, 2020
OSC motion due	May 27, 2020	June 24, 2020
OSC opposition due	June 17, 2020	July 15, 2020
OSC reply due	July 1, 2020	July 29, 2020

Dated: April 14, 2020

Dated: April 14, 2020

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By: /s/ John A. Polito  
John A. Polito

By: /s/ Eric D. Vandavelde  
Eric D. Vandavelde

*Attorneys for Plaintiffs Oracle USA, Inc.,  
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International Corporation*

*Attorneys for Defendants Rimini Street, Inc.,  
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**ATTESTATION OF FILER**

The signatories to this document are Eric D. Vandavelde and me, and I have obtained his concurrence to file this document on his behalf.

Dated: April 14, 2020

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ John A. Polito  
John A. Polito

*Attorneys for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I caused to be electronically uploaded a true and correct copy in Adobe “pdf” format of the above document to the United States District Court’s Case Management and Electronic Case Filing (CM/ECF) system. After the electronic filing of a document, service is deemed complete upon transmission of the Notice of Electronic Filing (“NEF”) to the registered CM/ECF users. All counsel of record are registered users.

DATED: April 14, 2020

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ John A. Polito  
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